

Jeff Carruth (TX SBN: 24001846)
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PROPOSED ATTORNEYS FOR
HIGH PLAINS RADIO NETWORK, LLC,
DEBTOR AND DEBTOR IN POSSESSION

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

IN RE:	§	
	§	
HIGH PLAINS RADIO NETWORK, LLC,	§	CASE NO. 24-70089
	§	
DEBTOR.	§	EXPEDITED HEARING REQUESTED
	§	

**MOTION TO EXPEDITE HEARING REGARDING UTILITIES MOTION
(RE: DOCKET NOS. 15)**

TO THE HONORABLE SCOTT W. EVERETT, U.S. BANKRUPTCY JUDGE:

High Plains Radio Network, LLC, debtor and debtor in possession (the “Debtor”) files this *Motion to Expedite Hearings* regarding the motion(s) listed below and in support thereof would show to the Court the following.

1. On April 2, 2024, the Debtor filed the following “first day” motions (collectively, the “Subject Motions”).

Docket No.	Motion
15	Motion for Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services and (II) Establishing Procedures for Determining Requests for Additional Adequate Assurance

2. Requested hearing date: The Debtor respectfully requests that the Court set an expedited hearing regarding each of the Subject Motions **on or before April 15, 2024 and within the 20-day window of Code § 366.**

3. *Debtor requests that the hearing be conducted by WebEx and/or in Dallas, Texas in order to accommodate travel of the principal of the Debtor, and that the principal of the Debtor be permitted to appear by WebEx.*

4. *The time estimate for the hearing as to all of the Subject Motions is 30 minutes.*

5. Reason for expedited hearing: A hearing is necessary in order to address the utilities issue prior to 20-day deadline of the Code § 366.

6. Notice is sufficient. Setting an expedited hearing during the first 20 days of the case is sufficient, especially considering the procedural nature of the relief requested in the utilities motion.

7. Reason hearing not requested sooner. A hearing was requested as soon as possible after addressing other urgent early case “first day” matters.

WHEREFORE, High Plains Radio Network, LLC, the debtor and debtor-in-possession, respectfully requests that the Court set the Subject Motion for an expedited hearing **on or before April 15, 2024 and within the 20-day window of Code § 366.** Debtor respectfully requests that the Court grant to Debtor such other and further relief to which the Debtor is entitled at law or in equity.

Dated: November 29, 2022

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth
JEFF CARRUTH (TX SBN: 24001846)
2608 Hibernia, Suite 105
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PROPOSED ATTORNEYS FOR
HIGH PLAINS RADIO NETWORK, LLC,
DEBTOR AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on April 4, 2024 (1) by electronic notice to all ECF users who have appeared in this case to date, and/or as set forth below and (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix).

COPIES OF THE EXHIBITS WERE NOT SERVED BY REGULAR MAIL. PLEASE CONTACT THE UNDERSIGNED IF YOU WISH TO RECEIVE THE EXHIBITS.

/s/ Jeff Carruth
Jeff Carruth
ECF SERVICE LIST

24-70089-swe11 Notice will be electronically mailed to:

Jeffery D. Carruth on behalf of Debtor High Plains Radio Network, LLC
jcarruth@wkpz.com,
jcarruth@aol.com; atty_carruth@trustesolutions.com; carruthjr87698@notify.bestcase.com; ATTY_CARRUTH@bluestylus.com

Paul H. Cross on behalf of Creditor Hanmi Bank
phclease@msn.com

Shanna M. Kaminski on behalf of Interested Party mp Union Funding Source, Inc.
skaminski@kaminskilawpllc.com

Julie Anne Parsons on behalf of Creditor Eastland County Appraisal District
jparsons@mvbalaw.com,
kalexander@mvbalaw.com; theresa.king@mvbalaw.com; juanie.montalvo@mvbalaw.com

Julie Anne Parsons on behalf of Creditor The County of Henderson, Texas

jparsons@mvbalaw.com,
kalexander@mvbalaw.com;theresa.king@mvbalaw.com;juanie.montalvo@mvbalaw.com

Julie Anne Parsons on behalf of Creditor The County of Stephens, Texas

jparsons@mvbalaw.com,
kalexander@mvbalaw.com;theresa.king@mvbalaw.com;juanie.montalvo@mvbalaw.com

Scott M. Seidel -SBRA V

scott@scottseidel.com, csms11@trustesolutions.net; susan.seidel@earthlink.net

United States Trustee

ustpregion06.da.ecf@usdoj.gov

David Weitman on behalf of Creditor Vertical Bridge REIT, LLC

david.weitman@klgates.com

REGULAR MAIL LIST

Case 24-70089-swe11 Doc 8 Filed 03/29/24 Entered 03/29/24 21:32:46 Desc Main Document Page 1 of 2

United States Bankruptcy Court
Northern District of Texas
Dallas Division

High Plains Radio Network LLC

Case No. 24-70089

VERIFICATION OF CREDITOR MATRIX

Name	Address1	Address2	City	State	Zip
Alco	W222 N833 Chaney Rd		Waukesha	WI	53186
Alco Equipment Finance Group Inc.	W 222 N 833 Cheaney Road		Waukesha	WI	53186
American Express	PO Box 6031		Carol Stream	IL	60197-6031
Amur	304 W. 3rd St		Grand Island	NE	68801
Arrakis Automations	6604 Powell St		Loveland	CO	80537
ASCAP	250 West 57th St		New York	NY	10107
Ascentium	23970 HWY 59 Nth.		Kingwood	TX	77339
Atmos Energy	PO Box 740353		Cincinnati	OH	45274-0353
Balboa	575 Anton Blvd 12th Flr.		Costa Mesa	CA	92626
Black Hills Natural Gas	PO Box 6006		Rapid City	SD	57709
Blue Bridge	11921 Freedom Dr.		Reston VA	VA	20190
Blue Bridge Financial LLC	11921 Freedom Dr.	Suite 1130	Reston	VA	20190
Bluepeak Telephone	5100 S. Broadband Lane		Sioux Falls	SD	57108
BMI	PO Box 630893		Cincinnati	OH	45263-0893
Bryn Mawr Equipment Finance Inc.	801 Lancaster Avenue		Bryn Mawr	PA	19010
CT Corp. Sys.	Attn: SPRS	330 N Brand Blvd	Glendale	CA	91203
Channel Partners Capital	11100 Wayzata Blvd		Minnetonka	MN	55305
City of Altus	509 S Main St		Altus	OK	73521
City of Hereford	PO Box 2277		Hereford	TX	79045-2277
City of Plainview	202 W 5th		Plainview	TX	79072
City of Vernon	1725 Wilbarger St		Vernon	TX	76384-4741
Crest Capitol	PO Box 88233		Atlanta	GA	30356
Entergy Utility	PO Box 8105		Baton Rouge	LA	70891-8105
Excel Energy	PO Box 9477		Minneapolis	MN	55484-9477
Federal Communications Com.	45 L Street NE		Washington	DC	20554
Financial Agent Services	PO Box 2576		Springfield	IL	62708
First State Bank Athens	PO Box 471		Athens	TX	75751
Global Music Rights	1801 W Olympic Blvd		Pasadena	CA	91199-2280
Hammi Bank	5403 Olympic Dr. #200		Gig Harbor	WA	98335
Hansen LaPorte	14201 Memorial Dr		Houston	TX	77079
Hitachi Capital America Corp.	7808 Creekridge Circle	Suite 250	Edina	MN	55439
Internal Revenue Service	Centralized Insolvency Operation	PO Box 7317	Philadelphia	PA	19101-7317
Liberty Mutual Insurance	175 Berkeley St		Boston	MA	02116
Litefund Solutions	99 Wall St #2613		New York	NY	10005
Marlin - Peak Com.	300 Fellowship Rd		Mt. Laurel	NJ	08054
Marlin Leasing Corp	300 Fellowship Rd		Mount Laurel	NJ	08054
Media Facilities	1740 Dell Range Blvd. #418		Cheyenne	WY	82009
Meridian	367 Eagleview Blvd.		Exton	PA	19341
Meridian Equipment Finance LLC	9 Old Lincoln Highway		Malvern	PA	19355
Midland States Bank	1801 Park 270 Drive	Suite 200	St. Louis	MO	63146
Mitsubishi HC	7201 Metro Blvd. Ste 800		Edina	MN	55439
Monte Spearman	PO Box 3649		Palestine	TX	80534

3/29/2024, 9:21 PM

Page 1 of 2

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Case 24-70089-swe11 Doc 8 Filed 03/29/24 Entered 03/29/24 21:32:46 Desc Main Document Page 2 of 2

United States Bankruptcy Court
Northern District of Texas
Dallas Division

High Plains Radio Network LLC

Case No. 24-70089

VERIFICATION OF CREDITOR MATRIX

Name	Address1	Address2	City	State	Zip
New Lane Fin, B-M	801 Landcaster Ave		Bryn Mawr	PA	19010
North Arkansas Electric	PO Box 1000		Salem	AR	72576-1000
Optimum Telephone	1111 Stewart Ave.		Bethpage	NY	11714-3581
Pawnee	3801 Automation Way #207		Ft Collins	CO	80525
SBA Covid-19 Disaster Loan	PO Box 3918		Portland	OR	97208-3918
SecureNet	101 N Federal HWY Ste 601		Boca Raton	FL	33432
SESAC	PO Box 5246		New York	NY	10008-5246
Summit	4680 Parkway Dr #300		Mason	OH	45040
Summit Natural Gas	PO Box 676358		Dallas	TX	75267-6357
The Fundworks	299 S. Main St. #1300		Salt Lake City	UT	84111
Turbo Capital	2308 N Market St		Wilmington	DE	19802
TXU Utility	PO Box 650638		Dallas	TX	75265-0638
U.S. Bank Equipment Finance	1310 Madrid Street		Marshall	MN	56258
U.S. Small Business Administration	1545 Hawkins Blvd	Suite 202	El Paso	TX	79925
United First LLC	2999 NE 191st St		Miami	FL	33180
United Funding	1835 E Hollandale Beach BLVD		Hollandale Beach	FL	33009
Verizon Cell Phone	PO Box 660108		Dallas	TX	75266-0108
Vertical Bridge	750 Park of Commerce Dr #200		Boca Raton	FL	33487
Zula Com	PO Box 3649		Palestine	TX	75801

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The above-named Debtor hereby verifies that the creditors list above is true and correct to the best of the knowledge of the Debtor.

Dated: 3/29/2024

Debtor: High Plains Radio Network LLC

By: /s/ Monte Spearman
Manager / President

3/29/2024, 9:21 PM

Page 2 of 2

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PROPOSED ORDER

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
HIGH PLAINS RADIO NETWORK, LLC,	§	CASE NO. 24-70089
	§	
DEBTOR.	§	

**ORDER GRANTING MOTION TO EXPEDITE HEARING REGARDING
UTILITIES MOTION (RE: DOCKET NOS. 15, 24)**

On this day the Court considered the *Motion to Expedite Hearing Regarding Utilities Motion* (Docket No. 24) (the “Motion to Expedite”) filed herein on April 2, 2024 by High Plains Radio Network, LLC, debtor and debtor in possession (the “Debtor”). Upon review of the Motion to Expedite, the Court is of the opinion that sufficient cause exists to set an expedited hearing regarding each of the following motions filed by the Debtor (collectively, the “Subject Motions”).

Docket No.	Motion
15	Motion for Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services and (II) Establishing Procedures for Determining Requests for Additional Adequate Assurance

IT IS THEREFORE ORDERED THAT the Court shall conduct an expedited hearing on the Subject Motions at the date and time entered on the docket for this case. **The hearing shall be conducted by WebEx, and the representative of the Debtor may appear by WebEx.** Movant shall be responsible for notice.

END OF ORDER

Submitted by:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth
JEFF CARRUTH (TX SBN: 24001846)
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